

**Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233**

I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233.

Many of the proposals in NPRM, contrary to the FCC's stated objectives, would harm both localism and diversity of viewpoints.

My wife Susan Kraus and I own our own radio station because we have always wanted to. We are career broadcasters. Please do not paint us with the same brush as you would rightly paint the many consolidators and mega-groups in both large AND small markets who may have abdicated their local responsibilities. We are not them.

As major operating costs are quickly rising, and more Americans are turning to new media, the NPRM proposes measures that would substantially raise costs – something that will be keenly felt among small market and specialized programming broadcasters. The rational economic response will be service cutbacks or outright shutdowns. Neither outcome is in the public interest.

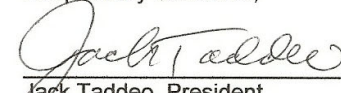
One of these ill-advised proposals would force radio stations to curtail reliance on labor-saving technology. An end to unstaffed operations will not improve responsiveness to a local community. To the contrary, it will likely lead stations to broadcast fewer hours or shut down altogether. Unattended operation with proper safeguards has helped small stations provide more service through efficiency. Take that away, and the Commission will create strong disincentive for stations to stay on during the late evening or early morning hours, hours during which very little revenue is generated. The increased operational costs will lead new entrepreneurs, including women and minorities, to look elsewhere to invest their savings and sweat equity. Our station voluntarily added Amber Alert capability and joined the EAS system shortly after our purchase of it. We believe strongly in "walking the walk" and we have always played by the rules as well as living up to the *spirit* of those rules.

The Commission must reject a proposal that would further limit where broadcasters can locate their main studios. The Commission acted in the public interest when it adopted rules many years ago to permit stations greater flexibility in selecting the location of their main studios, particularly in situations in which a broadcaster operates stations licensed to several nearby communities. If the Commission were to force each station to establish its main studio only in that station's community of license, the result would be that broadcasters – particularly small market and specialty programming broadcasters – would have to divert their limited financial resources from supporting and enhancing quality programming to covering additional and unnecessary real estate costs. That said, our station currently resides in it's city of license, Cleveland, WI, and we have no intention of relocating even though virtually no revenue is generated out of the village of roughly 1,300 people. It is a 20 minute ride from our location to either of the closest cities we serve but that is my problem, no one else's. I do not ask for consideration because my cost of doing business is higher than other stations in my trading area. However, I do think that as long as a station is responsible to it's city of license the current rules are fair.

I do NOT believe the FCC's proposal to force stations to give airtime to community groups is bad if it is properly executed. One proposal would enforce public access requirements, similar to cable PEG channels. Though cable has dozens, even hundreds of channels from which it can profit, smaller market radio stations like ours serve small audiences using only one channel. Free is not really free to those who struggle every day just to keep the electricity flowing, the programming going, and the local news covered. But, I do not disagree that stations should make some air time available to local city of license or coverage/service areas and I would be pleased to present a regularly scheduled block of airtime for use by local groups or governments. As long as said programming conforms to FCC rules for content, etc. and as long as the licensee would be held harmless as a result of the broadcast.

Smaller stations are keenly attuned to the communities they serve – it is how they remain in business. But the balance is delicate, and the Commission must not take action that will tip the balance so stations cut back on service or drop out. There is no 'public interest' in service that is both diminished and less diverse.

Respectfully submitted,


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